

EXHIBIT B

Subject: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:05:37 PM Eastern Standard Time

From: Jenny Kasen

To: rosner@teamrosner.com

CC: mmunoz@golenbock.com, randymot4@gmail.com, leonard.collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@RC.com

Attachments: 2.12.24 Rosner.pdf

Dear Mr. Rosner:

Please see the attached correspondence. Please confirm by end of business today that movants consent to my request for a two (2) week extension of time to respond to the Amended Motion to Vacate that you recently filed with the Bankruptcy Court.

Also, please confirm that you, Michael M. Munoz, Esq., Randy Mott, Esq., Deborah Mott, Steven Acosta and Christopher Mott will all appear and submit to live examination, under oath and in person, at the hearing on the Motion, and that you will accept email service of subpoenas therefore.

Regards,

Jenny R. Kasen, Esquire
Kasen & Kasen, P.C.
Tel: 302.652.3300 | Fax: 856.424.7565
E-Mail: jkasen@kasenlaw.com
www.kasenlaw.com

New Jersey | Pennsylvania | Delaware | Florida | New York

KASEN & KASEN
A PROFESSIONAL CORPORATION

Attorneys at Law

DAVID A. KASEN Δ*o†
FRANCINE STEIN KASEN Δ

SOCIETY HILL OFFICE PARK, SUITE 3
1874 E. MARLTON PIKE (ROUTE 70)
CHERRY HILL, NJ 08003 2038

DELAWARE OFFICE
1213 N. KING STREET
SUITE 2
WILMINGTON, DE 19801
TEL: (302) 652-3300

JENNY R. KASEN Δ*♦♦o
MICHAEL J. KASEN *

TEL: (856) 424-4144

FAX: (856) 424-7565

PENNSYLVANIA OFFICE
7909 BUSTLETON AVENUE
PHILADELPHIA, PA 19152
TEL: (215) 923-1665

Δ MEMBER OF NJ BAR
* MEMBER OF PA BAR
♦ MEMBER OF FLA BAR
◇ MEMBER OF DEL BAR
◇ MEMBER OF NY BAR
o BOARD CERTIFIED -
CONSUMER BANKRUPTCY LAW -
AMERICAN BRD OF CERTIF -
ACCREDITED BY THE ABA
† BOARD CERTIFIED -
BUSINESS BANKRUPTCY LAW -
AMERICAN BRD OF CERTIF -
ACCREDITED BY THE ABA

www.kasenlaw.com

EMAIL:
dkasen@kasenlaw.com
fkasen@kasenlaw.com
jkasen@kasenlaw.com
mkasen@kasenlaw.com

FLORIDA OFFICE
201 S. BISCAYNE BOULEVARD
SUITE 2800
MIAMI, FL 33131
TEL: (856) 424-4144

NEW YORK OFFICE
115 BROADWAY
5th FLOOR
NEW YORK, NY 10006
TEL: (646) 397-6226

February 12, 2024

Frederick B. Rosner, Esq.
The Rosner Law Group LLC
824 N. Market Street, Suite 810
Wilmington, DE 19801
Phone: (302) 777-1111
Email: rosner@teamrosner.com

Re: *Miller v. Mott, et al. (In re Team Systems International, LLC)* – Ch 7 No. 22-10066
(CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND
TO MOTION

Dear Mr. Rosner:

I have carefully reviewed the Motion to Vacate [D.I. 416], Amended Motion to Vacate [D.I. 422] (the “**Motion**”), and accompanying declarations of Deborah Mott and Steven M. Acosta [D.I. 418, D.I. 419, D.I. 424 and D.I. 425] that you recently filed with the Bankruptcy Court.

I have also carefully reviewed the Professional Ethics Complaint that your co-counsel, Randy M. Mott, Esq., filed against me in the Delaware Supreme Court, Office of Disciplinary Counsel. And, I am aware that your co-counsel, Randy M. Mott, Esq. has also apparently filed a Professional Ethics Complaint against my co-counsel Leonard Collins, Esq. in the Florida Supreme Court.

You, your co-counsel, your respective law firms, and clients have made extremely disturbing and defamatory accusations against me, my co-counsel and clients. The allegations made against us are of the most serious nature – allegations that we forged bank statements and used them in a Federal Bankruptcy Court proceeding with intentions to deceive the Court. Your accusations are demonstrably false and highly damaging. Further, your actions to perpetuate and endorse this known falsehood is the most despicable and vexatious litigation tactic I have seen in my over 13 years of practicing law.

Based on the foregoing, please be advised that, my co-counsel, clients and I will be filing a fulsome response to the Motion, wherein we will be seeking, among other things, the imposition of sanctions against you, your co-counsel, your respective law firms, and clients to the harshest extent permitted by law. Also, we will be subpoenaing you, your co-counsel and clients, among others, to appear and submit to live examination, under oath and in person, at the hearing on this Motion.

Please be further advised, however, that I need a two (2) week extension of time to respond to the Motion and to prepare the foregoing subpoenas - an extension through and including February 27, 2024 - as I was out of the office all last week due to a family emergency, and will also only be available to work part time this week.

Please confirm by end of business today that movants consent to this request for a two (2) week extension of time, and I will take care of preparing the stipulation.

Also, please confirm that you, Michael M. Munoz, Esq., Randy Mott, Esq., Deborah Mott, Steven Acosta and Christopher Mott will all appear and submit to live examination, under oath and in person, at the hearing on the Motion, and that you will accept email service of subpoenas therefore.

Regards,

/s/ Jenny R. Kasen

JENNY R. KASEN

JRK:jk

Via email: rosner@teamrosner.com

Cc: mmunoz@golenbock.com; randymot4@gmail.com; leonard.collins@gray-robinson.com; Michael.Moody@michaelmoodylaw.com; carickhoff@chipmanbrown.com; hall@chipmanbrown.com; Richard.Schepacarter@usdoj.gov; cabot@cclawyers.net; BBabbitt@RC.com

Subject: Re: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:15:43 PM Eastern Standard Time

From: Frederick B. Rosner

To: Jenny Kasen

CC: mmunoz@golenbock.com, randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

Thanks Jenny.

My colleagues Randy Mott & Mr. Munoz are handling so I will defer to them.

Best,

Fred.

Sent from my iPhone. Apologies for any typos or grammatical errors.

Subject: Re: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:17:28 PM Eastern Standard Time

From: Jenny Kasen

To: Frederick B. Rosner

CC: mmunoz@golenbock.com, randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

Dear Fred:

There was an error in my correspondence. I am asking for a 2 week extension of time – through and including **March 5, 2024** (not February 27th).

Very truly yours,

Jenny R. Kasen, Esquire

Kasen & Kasen, P.C.

Tel: 302.652.3300 | Fax: 856.424.7565

E-Mail: jkasen@kasenlaw.com

www.kasenlaw.com

New Jersey | Pennsylvania | Delaware | Florida | New York

Subject: RE: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:18:48 PM Eastern Standard Time

From: Frederick B. Rosner

To: Jenny Kasen

CC: mmunoz@golenbock.com, randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

Thanks.

Again, Mr. Mott will get back to you.

Fred

Subject: Re: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:23:05 PM Eastern Standard Time

From: Jenny Kasen

To: Frederick B. Rosner

CC: mmunoz@golenbock.com, randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

Dear Mr. Rosner:

Please be advised that if I do not get an affirmative response to my request from either you or your co-counsel by end of business today, I will be requesting an emergency status conference with the Court first thing tomorrow morning.

Please proceed accordingly.

Very truly yours,

Jenny R. Kasen, Esquire

Kasen & Kasen, P.C.

Tel: 302.652.3300 | Fax: 856.424.7565

E-Mail: jkasen@kasenlaw.com

www.kasenlaw.com

New Jersey | Pennsylvania | Delaware | Florida | New York

Subject: RE: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:26:06 PM Eastern Standard Time

From: Frederick B. Rosner

To: Jenny Kasen

CC: mmunoz@golenbock.com, randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

I think Mr. Mott is overseas so there may be a time difference but you should get a response in 24 hours if not sooner.. I do not expect there will be a problem.

Best,

Fred

Subject: RE: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:26:47 PM Eastern Standard Time

From: Michael Munoz

To: Frederick B. Rosner, Jenny Kasen

CC: randymot4@gmail.com, Leonard.Collins@gray-robinson.com,
Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com,
hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net,
BBabbitt@rc.com

Jenny, I spoke with Randy Mott. Without commenting on the substance of your letter, counsel for defendants has no objection to your requested extension, to and including March 5.

Michael

Michael M. Munoz
GEABP LLP
(212) 907-7345
(917) 405-9076

Subject: Re: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:28:12 PM Eastern Standard Time

From: Jenny Kasen

To: Michael Munoz, Frederick B. Rosner

CC: randymot4@gmail.com, Leonard.Collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@rc.com

Thank you Mr. Munoz. I will prepare the stipulation.

Please also confirm that you, Fred Rosner, Esq., Randy Mott, Esq., Deborah Mott, Steven Acosta and Christopher Mott will all appear and submit to live examination, under oath and in person, at the hearing on the Motion, and that you will accept email service of subpoenas therefore.

Very truly yours,

Jenny R. Kasen, Esquire

Kasen & Kasen, P.C.

Tel: 302.652.3300 | Fax: 856.424.7565

E-Mail: jkasen@kasenlaw.com

www.kasenlaw.com

New Jersey | Pennsylvania | Delaware | Florida | New York

Subject: RE: Miller v. Mott, et al. (In re Team Systems International, LLC) – Ch 7 No. 22-10066 (CTG)/Adv. No. 23-50004(CTG) – REQUEST FOR EXTENSION OF TIME TO RESPOND TO MOTION

Date: Monday, February 12, 2024 at 2:34:05 PM Eastern Standard Time

From: Michael Munoz

To: Jenny Kasen, Frederick B. Rosner

CC: randymot4@gmail.com, Leonard.Collins@gray-robinson.com,
Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com,
hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net,
BBabbitt@rc.com

We will have to get back to you on those issues this week, as we need to consider and also speak with the individuals you identify. Please circulate the extension stipulation to me, Fred and Randy Mott. Thanks.

Michael M. Munoz
GEABP LLP
(212) 907-7345
(917) 405-9076

Subject: Reply to your email

Date: Wednesday, February 14, 2024 at 12:04:28 PM Eastern Standard Time

From: randymott@rmottlaw.com

To: Jenny Kasen

CC: mmunoz@golenbock.com, randymot4@gmail.com, leonard.collins@gray-robinson.com, Michael.Moody@michaelhmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@RC.com

My co-counsel will respond to any of the requests related to the proceedings in the bankruptcy court.

On the other matter, I am bound by the D.C. Bar rules and am required to report instances where attorneys' misrepresentations threaten the integrity of the judicial process. DC Rule 3.3(d). I filed a complaint in Delaware on your conduct and have been working on similar complaints on others yet unfiled.

I stand by everything submitted to the Court (and there will be more in the near future). I also firmly stand by everything that I personally submitted to the Delaware Bar. As one of the judicial decisions quoted in our recent pleadings noted, the rules exist to prevent litigants from playing "fast and loose." The bar complaint(s) are my individual action only as a member of the D.C. bar being bound by their rules.

Randy Mott, Esq.
1629 K St NW, Suite 300
Washington, DC 20006
DC Bar 211037
202 470 0106
randymott@rmottlaw.com

Subject: Re: Reply to your email

Date: Wednesday, February 14, 2024 at 12:13:11 PM Eastern Standard Time

From: Jenny Kasen

To: randymott@rmottlaw.com

CC: mmunoz@golenbock.com, randymot4@gmail.com, leonard.collins@gray-robinson.com, Michael.Moody@michaelmoodylaw.com, carickhoff@chipmanbrown.com, hall@chipmanbrown.com, Richard.Schepacarter@usdoj.gov, cabot@cclawyers.net, BBabbitt@RC.com, "Frederick B. Rosner"

Dear Mr. Mott:

Please immediately confirm that you will appear and submit to live examination, under oath and in person, at the hearing on the Motion, and that you and your co-counsel will accept email service of a subpoena therefore.

Very truly yours,

Jenny R. Kasen, Esquire

Kasen & Kasen, P.C.

Tel: 302.652.3300 | Fax: 856.424.7565

E-Mail: jkasen@kasenlaw.com

www.kasenlaw.com

New Jersey | Pennsylvania | Delaware | Florida | New York